

1 Joseph N. Mott  
2 Nevada Bar No. 12455  
3 LAW OFFICES OF STEVEN J. PARSONS  
4 10091 Park Run Dr Ste 200  
5 Las Vegas, NV 89145-8868  
6 (702) 384-9900  
7 (702) 384-5900 – (fax)  
[Jmott@SJPlawyer.com](mailto:Jmott@SJPlawyer.com)

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6 Attorneys for  
7 Petitioners and former Plaintiffs  
**MATGARITO LAGUNAS-SALAZAR** and  
**CLEMENTINA MONROY-MIRANDA**

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 **MATGARITO LAGUNAS-SALAZAR**, an  
11 individual; **CLEMENTINA MONROY-**  
12 **MIRANDA**, an individual; and each of them  
as Guardians *ad litem* of **MICHELLE**  
13 **MONROY**, an individual minor,

14 Plaintiffs,

15 vs.

16 **DALE SUMMERLIN**, an individual;

17 Defendant.

Case No. 2:12-cv-867-RFB-(VCF)

PETITIONERS and FORMER PLAINTIFFS  
**MATGARITO LAGUNAS-SALAZAR** and  
**CLEMENTINA MONROY-MIRANDA'S**  
**MOTION TO FILE UNDER SEAL**, and  
**(PROPOSED) ORDER**

(Fed. R. Civ. P., 5.2 and Local Rule IA 10-5)

18 Petitioners and former Plaintiffs **MATGARITO LAGUNAS-SALAZAR** and **CLEMENTINA**

19 **MONROY-MIRANDA**<sup>1</sup> (“Petitioners”), the natural parents and Guardians *ad litem* of **MICHELLE**

20 **LAGUNAS-MONROY**, an individual minor child, by their counsel, Joseph N. Mott, of LAW OFFICES

21 OF STEVEN J. PARSONS, and as provided for within Fed. R. Civ. P., 5.2 and Local Rule IA 10-5,

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23 <sup>1</sup>On August 2, 2016, their individual cases having been settled, Plaintiffs **MATGARITO**  
24 **LAGUNAS-SALAZAR**, and **CLEMENTINA MONROY-MIRANDA** moved the Court to dismiss their  
25 claims as individuals, *with prejudice*. By way of the Stipulation the parties filed on August 2, 2016, only claims for Michelle, the minor child remain.

26 Here, as Guardians *ad litem*, they Petition the Court on behalf of their minor child  
27 **MICHELLE LAGUNAS-MONROY**, as set forth herein. Upon the Court's consideration of the  
instant Petition, the entire case will be dismissed, *with prejudice*.

1 hereby requests permission to file, under seal, medical records and billings for **MICHELLE**  
2 **LAGUNAS-MONROY**, the minor.

3 Petitioners have contemporaneously also filed a Petition seeking the Court's approval  
4 of the Compromise of Disputed Claims of a Minor on behalf of the minor child.

5 This Motion seeks the Court's permission to file, under seal, the subject medical  
6 records and billings in support of the Petition, and is brought and based upon the pleadings  
7 and papers on file, and the attached Memorandum of Points and Authorities.

8 Dated: Wednesday, October 26, 2016.

9 **LAW OFFICES OF STEVEN J. PARSONS**

10 /s/ Joseph N. Mott  
11 **JOSEPH N. MOTT**  
12 Nevada Bar No. 12455

13 Attorneys for Petitioners and former Plaintiffs  
**MATGARITO LAGUNAS-SALAZAR** and  
**CLEMENTINA MONROY-MIRANDA**

14 **CERTIFICATE OF SERVICE**

15 Within FRCP 5, LR IA 10-5, and LR IC 4-1, I hereby certify that service of the foregoing  
16 Petitioners Matgarito Lagunas-Salazar and Clementina Monroy-Miranda's Motion to File Under  
17 Seal and all documents was made upon all parties by e-filing with the Court's electronic filing  
18 system and by hand delivery in accordance with LR IC 4-1(C).

19 Dated: October 26, 2016.

20 /s/ Candice Benson  
21 An Employee of **LAW OFFICES OF STEVEN J. PARSONS**

22 **MEMORANDUM OF POINTS AND AUTHORITIES**

23 FRCP 5.2(d) provides, "The court may order that a filing be made under seal without  
24 redaction. The court may later unseal the filing or order the person who made the filing to file  
25 a redacted version for the public record."

26 LR IA 10-5(a) provides, "Unless otherwise permitted by statute, rule or prior court order,  
27 papers filed with the court under seal shall be accompanied by a motion for leave to file those

1 documents under seal.... All papers filed under seal will remain sealed until the court either  
2 denies the motion to seal or enters an order unsealing them."

3 Pursuant to these sections, Petitioners move the Court for permission to file under seal  
4 the minor child's medical records and billings, which are referenced as Exhibit 1 of Petitioners  
5 and former Plaintiffs Matgarito Lagunas-Salazar and Clementina Monroy-Miranda's Petition for  
6 Compromise of Disputed Claims of a Minor, filed on or about October 26, 2016, (Doc. No.  
7 82).

8 Dated: Wednesday, October 26, 2016.

9 **LAW OFFICES OF STEVEN J. PARSONS**

10 /s/ Joseph N. Mott  
11 JOSEPH N. MOTT  
Nevada Bar No. 12455

12 Attorneys for Petitioners and former Plaintiffs  
13 **MATGARITO LAGUNAS-SALAZAR and**  
**CLEMENTINA MONROY-MIRANDA**

14 **ORDER**

15 **IT IS HEREBY ORDERED**, that upon Petitioners Matgarito Lagunas-Salazar and  
16 Clementina Monroy-Miranda's Petitions for Compromise of Disputed Claims of a Minor  
17 Michelle Lagunas-Monroy, the minor child, and upon the forgoing Motion, and within Fed. R.  
18 Civ. P., 5.2 and Local Rule IA 10-5, and good cause shown, the required medical records and  
19 expense billing, specifically Exhibit 1 of the Petition, only, shall be filed **UNDER SEAL**.

20 Dated: 11-1, 2016.

  
21 **U.S. MAGISTRATE JUDGE**

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